

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America

v.

No. 1:15-CR-00012-01-SM

Panos Eliopoulos

MOTION FOR RETURN OF PASSPORT

NOW COMES the Defendant, Panos Eliopoulos, by and through counsel, and moves this Honorable Court to return the Defendant's United States Passport. In support thereof, the Defendant states as follows:

1. On, March 10, 2016, the Defendant pled guilty to one count of Causing Misbranded Drugs to be Introduced into Interstate Commerce. On June 29, 2016, the Court sentenced the Defendant to a term of probation.

2. As a condition of his release, the Defendant surrendered his United States passport to the Court.

3. The Defendant is seeking the return of his passport.

WHEREFORE, the Defendant prays for the following relief:

- A. For the Court to return to the Defendant his United States passport;
- B. For such other relief the Court deems equitable and just.

Respectfully submitted,

Panos Eliopoulos
By his attorneys,

WILSON, BUSH & KEEFE

Dated: August 31, 2016

/s/ Charles J. Keefe
Charles J. Keefe
378 Main Street
Nashua, New Hampshire 03060
(603) 595-0007
NH Bar No.: 14209
keefe@wbdklaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Return of Passport was this date forwarded to Jennifer Davis, Esquire, Assistant U.S. Attorney, and to Jonathan Saxe, Esquire.

Dated: August 31, 2016

/s/ Charles J. Keefe
Charles J. Keefe